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July 29, 2021

Via ECF

Honorable Cecelia G. Morris United States Bankruptcy Court Southern District of New York 355 Main Street Poughkeepsie, New York 12601-3315

Re: Picard v. The Gerald and Barbara Keller Family Trust, et al. Adv. Pro. No. 10-04539 CGM) (Bankr. S.D.N.Y.)

Dear Judge Morris:

We represent the Defendants in the above referenced case. I write with the consent of counsel for the Trustee, Nicholas J. Cremona, who has approved this letter, to request a two week extension of the briefing schedule on the Trustee's motion for summary judgment as follow:

- Defendants' opposition due date is moved from August 4, 2021 to August 18, 2021:
- Trustee's reply is moved from August 11, 2021 to September 1, 2021.

In line with the extension, the Hearing before Your Honor should also be rescheduled from August 18, 2021 to September 15, 2021.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Helen Davis Chaitman

Helen Davis Chaitman

HDC:leb

cc: Nicholas, J. Cremona (<u>ncremona@bakerlaw.com</u>) (via Email)
All counsel via ECF